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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**DECLARATION OF MATTHEW P. GOREN
IN SUPPORT OF *EX PARTE* APPLICATION
FOR ORDER PURSUANT TO L.B.R. 9013-1(c)
AUTHORIZING OVERSIZE BRIEFING FOR
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF THE
DEBTORS' BAR DATE MOTION**

Related Document: Dkt. No. 1784

[No hearing requested]

1 I, Matthew P. Goren, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am counsel at the law firm of Weil, Gotshal & Manges LLP, counsel to PG&E
5 Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession
6 (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11**
7 **Cases**”). I submit this declaration in support of the Debtors’ *Ex Parte* Application (the
8 “**Application**”), pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the United States
9 District Court for the Northern District of California (the “**Bankruptcy Local Rules**”), for an order
10 authorizing the Debtors to file an oversize memorandum of points and authorities (the “**MPA**”) in
11 support of the *Motion of Debtors Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a), Fed. R. Bankr. P.*
12 *2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1 For Order (I) Establishing Deadline for Filing*
13 *Proofs of Claim, (II) Establishing the Form and Manner of Notice Thereof, and (III) Approving*
14 *Procedures for Providing Notice of Bar Date and Other Information to All Creditors and Potential*
15 *Creditors* (the “**Bar Date Motion**”) [Dkt. No. 1784], which the Debtors filed on May 1, 2019.

16 2. The Bar Date Motion seeks an order (i) establishing deadlines for filing proofs of
17 claim (the “**Bar Date**”), (ii) establishing the form and manner of notice thereof, and (iii) approving
18 the Debtors’ plan for providing notice of the Bar Date and other important deadlines and information
19 to all creditors and potential creditors. Due to the unique nature of these Chapter 11 Cases, the
20 Debtors are proposing special procedures to facilitate the submission and evaluation of Wildfire
21 Claims, including, as discussed in the Bar Date Motion, a simpler Wildfire Claim Bar Date Notice
22 and customized Proof of Claim Forms for both Wildfire Claimants and Wildfire Subrogation
23 Claimants. The Debtors are also proposing special procedures for providing notice of the Bar Date
24 to their 16 million Customers, including a simpler Customer Bar Date Notice. In addition to serving
25 the Bar Date Notices, as set forth in the Bar Date Motion, the Debtors intend to provide
26 supplemental notice of the Bar Date to unknown creditors, including Unknown Wildfire Claimants,
27 through a multi-faceted Supplemental Notice Plan that has been designed to reach its target
28 audiences in a variety of different ways, including: (i) multiple newspaper publication notices, (ii)

1 digital advertising, including social media and other paid internet search listings, (iii) television and
2 radio advertising, (iv) email notice, and (v) dedicated claim service centers..

3 3. To adequately describe the Debtors' unique circumstances, which necessitate and
4 justify the Notice Procedures, and detail the special procedures of which the Debtors seek the
5 Court's approval pursuant to the Bar Date Motion, the Debtors believe it is appropriate to request
6 authority for the MPA to exceed the 25 pages allowed under Bankruptcy Local Rule 9013-1(c).

7 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
8 inquiry, the foregoing is true and correct and that this declaration was executed at New York, New
9 York, on May 2, 2019.

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11 /s/ Matthew P. Goren

12 Matthew P. Goren
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